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September 29, 2017

VIA ELECTRONIC FILING

Jocelyn Boyd, Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

**Re: Request of the South Carolina Office of Regulatory Staff for Rate Relief
to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920
Docket No. 2017-305-E**

Dear Ms. Boyd:

Enclosed for filing please find a Petition to Intervene on behalf of The Electric Cooperatives of South Carolina, Inc. and Central Electric Power Cooperative, Inc. in the referenced docket. By copy of this letter we are serving same on the parties of record. Please contact me if you have any questions.

Yours truly,

Frank R. Ellerbe, III

FRE:tch

Enclosures

cc w/enc: K. Chad Burgess, Esquire (via email)
Matthew W. Gissendanner, Esquire (via email)
Belton T. Zeigler, Esquire (via email)
Mitchell Willoughby, Esquire (via email)
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John H. Tiencken, Jr., Esquire (via email)
Paul J. Conway, Esquire (via email)

BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2017-305-E

IN RE:

Request of the South Carolina Office of)
 Regulatory Staff for Rate Relief to)
 SCE&G Rates Pursuant to)
 S.C. Code Ann. § 58-27-920)
)

PETITION TO INTERVENE OF
THE ELECTRIC COOPERATIVES OF SOUTH CAROLINA, INC.
AND CENTRAL ELECTRIC POWER COOPERATIVE, INC.

Pursuant to Public Service Commission Regulation 103-825, and other applicable provisions of the Commission's Rules of Practice and Procedure, The Electric Cooperatives of South Carolina, Inc. ("ECSC") and Central Electric Power Cooperative, Inc. ("Central") (jointly referred to as the "Petitioners") hereby file this Petition to Intervene in the above-captioned proceeding. In support of this Petition, ECSC and Central state as follows:

1. ECSC consists of member electric cooperatives organized in the State of South Carolina. ECSC serves as a legal and regulatory representative of its member electric cooperatives. ECSC is the state-wide service and trade association for electric cooperatives in the state. ECSC's members are twenty consumer-owned electric cooperatives, one wholesale power supply cooperative (Central) and one materials supply cooperative. Together, ECSC's members operate the largest electric distribution system in the state. More than 1.5 million South Carolinians in all 46 counties use electricity from electric cooperatives. ECSC's principal place of business and mailing address is 808 Knox Abbot Drive, Cayce, South Carolina 29033.

2. Central is a generation and transmission electric cooperative formed under SC Code Section 33-49-10, *et seq.* Central's principal place of business is 20 Cooperative Way, Columbia, South Carolina 29210. Central's mailing address is P.O. Box 1455, Columbia, South Carolina 29202. Central is engaged in the purchase, transmission and sale of electric power to twenty (20) distribution electric cooperatives throughout the State of South Carolina. Central's distribution cooperative members provide electric power to over 700,000 homes, businesses, and industrial members throughout all 46 South Carolina counties and a small portion of North Carolina.

3. ECSC and Central have a substantial interest in the issues to be considered in this proceeding. The nuclear generating units under construction at Jenkinsville are a joint project of SCE&G and the Public Service Authority of South Carolina ("Santee Cooper"). Under a contract between Central and Santee Cooper, Central and the members of ECSC are responsible for seventy percent of Santee Cooper's capital costs. Thus Santee Cooper's share of the cost of the new nuclear units will be borne largely by ECSC members and Central, giving ECSC and Central a direct and significant interest in this proceeding in which the Commission will consider issues relating to costs of the nuclear units.

4. ECSC and Central intervened in Docket No. 2016-223-E and were parties to the Settlement Agreement in that Docket that was approved by this Commission in Order No. 2016-794. ECSC and Central continue to have an interest in all matters relating to that settlement which may be impacted by the issues to be addressed in this proceeding. ECSC and Central also have a direct interest in the allegations described in paragraph 17 of the petition filed by the Office of Regulatory Staff that initiated this proceeding.

5. Pursuant to Rule R. 103-804(S) of the Commission's Rules of Practice and Procedure, Petitioners are represented by counsel in this proceeding:

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WHEREFORE, Petitioners request that they be allowed to intervene in this docket, with full rights to participate as a parties of record, including, but not limited to, the ability to engage in discovery and participate in all hearings by offering testimony and exhibits and cross-examining witnesses. Petitioners request the receipt of all notices, documents, exhibits and data submitted by all parties and the Commission's staff.

Respectfully submitted,

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/s/ Frank R. Ellerbe, III

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September 29, 2017

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

In Re:)	Docket No. 2017-305-E
)	
Request of the Office of Regulatory Staff)	
for Rate Relief to SCE&G Rates)	
Pursuant to S.C. Code Ann. § 58-27-920)	
)	

This is to certify that I, Toni Hawkins, a paralegal with the law firm of Sowell, Gray, Robinson, Stepp & Laffitte, LLC, have this day, September 29, 2017, caused to be served upon the person(s) named below the **Petition to Intervene** in the foregoing matter by electronic mail to the email addresses below and by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

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Toni C. Hawkins